

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0180-001

10 CSR 10-5.220

<i>Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 1,000 Gallons)</i>
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Emission Limitations:

- (1) All gasoline storage tanks with a capacity greater than 1,000 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.
 - (a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days after discovery to bring the unit into compliance with the standards.
- (2) System shall be equipped with Stage I and Stage II vapor recovery systems which are MoPETP approved systems.

Record Keeping:

- (1) Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.
- (2) A copy of self inspections and repairs to correct deficits will be maintained on site.

Monitoring:

- (1) Stage II shall be inspected on a periodic (monthly) basis.
- (2) Permittee will perform blockage and leakage tests on Stage II systems as directed by local regulatory agency.

Reporting:

None

Permit Condition EU0180-002

10 CSR 10-5.220

<i>Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 500 Gallons and Less Than or Equal to 1,000 Gallons)</i>
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Emission Limitations:

- (1) All gasoline storage tanks with a capacity greater than 500 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.

- (a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days to bring the unit into compliance with the standards.

Record Keeping:

Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.

Monitoring:

None

Reporting:

None

Permit Condition EU0180-003

10 CSR 10-5.220

Permits Obtained Per the Requirements of 10 CSR 10-5.220

(1) Operating Permits: C2471, C2474

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

II) State/Local Only Enforceable Requirements

Permit Condition EU0180-004

10 CSR 10-5.443

Control of Gasoline Reid Vapor Pressure
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Emission Limitations:

Selling, dispensing, etc. gasoline with an RVP exceeding 7.0 psi is prohibited between 6/1 and 9/15 of each year, unless the gasoline is a blend with at least 9% to 10% ethyl alcohol by volume, in which case the RVP may not exceed 8.0 psi during the same period. By only buying compliant gasoline from 6/1 through 9/15 each year the tank will be deemed to be in compliance. The use of reformulated gasoline by definition complies with this rule.

Record Keeping:

Records shall be kept of the documents accompanying all gasoline shipments to this tank between 6/1 and 9/15. These records will indicate the Reid vapor pressure of the gasoline or that it is reformulated gasoline.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Reid vapor pressure for non-reformulated gasoline required by Emission Limitations.

10

EU0190
Fuel Storage Tanks

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60, Subpart Kb, 60.116(b) and 10 CSR 10-6.070	
NONE	ST-005-20	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-005-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-041-21	X	Jet fuel UST #1 (30,000 gal) A-41
NONE	ST-041-22	X	Jet fuel UST #2 (30,000 gal) B-41
NONE	ST-041-23	X	Jet fuel UST #3 (30,000 gal) C-41
NONE	ST-041-24	X	Jet fuel UST #4 (30,000 gal) D-41
NONE	ST-102-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-110-20	X	Fuel oil #2 UST (15,000 gal)
NONE	ST-120-01	NA	Vertical fuel oil #2 (107,000 gal)
NONE	ST-120-02	NA	Vertical fuel oil #2 (50,000 gal)
NONE	ST-111-01	X	Fuel oil #2 underground storage tank (12,000 gal)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) **Federally Enforceable Requirements**

Permit Condition EU0190-001

10 CSR 10-6.070 and 40 CFR Part 60 Subpart Kb, 60.116(b)
Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Emissions Limitations:

None

Recordkeeping:

Records of the tank dimensions and capacity shall be kept for the life of the tank.

Monitoring:

None

Reporting:

None

EU0200

Vapor Degreasers

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart T and 10 CSR 10-6.075: Halogenated Solvent Cleaning NESHAP	2) 10 CSR 10- 5.300: Control of Emissions from Solvent Metal Cleaning	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
VD-027-01	VD-027-01	X	X	#6325	Vapor degreaser (trichloroethylene)
VD-029-01	VD-029-01	X	X	#6258	Vapor degreaser (trichloroethylene)
VD-042-01	VD-042-01	X	X	#5083	Vapor degreaser (Vertrel SMT) PHILLIPS
VD-101-01	VD-101-01	X	X	#1172	Vapor degreaser (trichloroethylene)
VD-101-02	VD-101D-04	X	X	#6168	Vapor degreaser (trichloroethylene)
VD-102-01	VD-102-01	X	X	#1175	Vapor degreaser (trichloroethylene)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0200-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart T
Halogenated Solvent Cleaning NESHAP

Emission Limitations:

- (1) Use the three (3)-month rolling average compliance method. Emissions shall not exceed 150 kg per m² of solvent/air interface per month, averaged over three (3) consecutive months.
- (2) This rule is not applicable to the listed units when they do not contain a solvent subject to 40 CFR Part 63, Subpart T.

Record Keeping:

- (1) The following records shall be maintained for five (5) years:
 - (a) Dates and amounts of solvent added to or removed from each unit;
 - (b) Calculations showing the three (3)-month rolling average results.

Monitoring:

None

Reporting:

- (1) Initial Statement of Compliance – due within 150 days of NESHAP or startup, whichever is later.
 - (2) Annual Solvent Emission Report – due by February 1st for the prior year.
 - (3) Exceedance Report – due by the 30th day following the end of each calendar half or quarter as required by 40 CFR 63.468.
- is this already passed?*

Alternate Compliance Method:

- (1) Equipment Standard. The equipment standards as stated in 40 CFR Part 63, Subpart T as alternate standards, may be used to show compliance instead of those listed above. If one of the alternate standards is used the monitoring, record keeping and reporting requirements listed in the regulation, for the standard chosen, will be followed.

Permit Condition EU0200-002

10 CSR 10-5.300
Control of Emissions from Solvent Metal Cleaning

Emission Limitations:

- (1) Operational restrictions as listed in 10 CSR 10-5.300.
- (2) Training
 - (a) Only persons who have received training on the operational and equipment requirements specified in this rule are allowed to operate the equipment.
 - (b) The supervisor of any person who operates the equipment must have equal or better training.
 - (c) Refresher training shall be given to all operators every 12 months.

- (3) This rule is not applicable to the listed units when they only contain 1,1,1-trichloroethane, trichlorotrifluoroethane, and/or any other exempt VOC.

Record Keeping:

- (1) Monthly inventory records of vapor degreaser consumption and amount purchased. These records shall include maintenance and repair logs for both the degreaser and any associated control equipment.
- (2) A record of solvent metal cleaning training shall be kept for each employee who has been trained. These records shall be maintained for two (2) years.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of solvent vapor pressure allowed in 10 CSR 10-5.300

Permit Condition EU0200-003
10 CSR 10-6.060 Air Construction Permits
(1) Requirements of the Construction Permit Numbers: #'s 6325, 1137, 1172, 6168, 1175 <u>Emission Limitations:</u> None <u>Record Keeping:</u> None <u>Monitoring:</u> None <u>Reporting:</u> None
(2) Requirements of the Construction Permit Number: #6258 <u>Emission Limitations:</u> Trichloroethylene usage is limited to two thousand five hundred sixty-three (2563) gallons per year on a twelve (12) month rolling average.

- (1) Requirements of the Construction Permit Numbers: #'s 6325, 1137, 1172, 6168, 1175

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

- (2) Requirements of the Construction Permit Number: #6258

Emission Limitations:

Trichloroethylene usage is limited to two thousand five hundred sixty-three (2563) gallons per year on a twelve (12) month rolling average.

Record Keeping:

- (1) The permittee shall maintain monthly usage records on site, for the latest twenty-four (24) month period, which clearly demonstrates compliance with the limit established in the emission limitation above.
- (2) The permittee shall maintain records that show the twelve (12) month rolling average of trichloroethylene usage.

Monitoring:

None

Reporting:

Should the records indicate that a *exceedance* violation of the emission limitation above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day.

This notification is not required to be certified by a responsible official.

**XXI. UNITS WITH NO
APPLICABLE
REQUIREMENTS, BUT MAY
BE INCLUDED IN THE EIQ**

			DESCRIPTION
			(for information only, this does not create any permit requirements)
EIQ POINT NUMBER	EMISSION UNIT NUMBER	NO EMISSION UNIT SPECIFIC APPLICABLE REQUIREMENTS	
BF-STL-02	SB-042-01	X	Vented hood (Electronics coatings) (brushed or dipped not sprayed)
CC-STL-01	CC-245-04	X	Solvent bath used for cleaning paint brushes
CC-STL-01	CC-STL-01C	X	Plantwide cleaning units less than 1 gal or 1 ft ² surface area
CL-002-01	MB-002-01	X	Vented paint mixing room
CL-002-02	SB-002-03	X	Bench spray booth (aerosol cans)
CL-002-02	MB-002-02	X	Vented paint mixing room
CL-101-01	SB-101-46	X	Spray booth (Aerosol Cans)
CL-101-01	SB-101-01	X	Spray booth (lockfoam operations) (no painting)
CL-101-01	SB-101-03	X	Lab hood for conformal coating of parts
CL-101-01	SB-101-07	X	Bench spray booth (4 sections) (lockfoam operations) (no painting)

CL-101-03	MB-101-01	X	Vented hood for paint mixing
CL-101-03	MB-101-02	X	Vented paint mixing hood
CL-101-03	MB-120-01	X	Vented chemical mixing/dispensing room
CL-245-01	SB-245-03	X	Vented painting area (tooling only, possible maintenance)
CL-245-01	SB-245-05	X	Small paint booth (Aerosol cans and grinding)
CL-245-01	MB-245-01	X	Vented paint mixing room
CS-027-01	CS-027-01	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-02	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-03	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-04	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-05	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-06	X	Natural gas make-up air heater {12.2 MMBTU/hr}
CS-STL-01	CS-STL-01B	X	Plantwide combustion (direct natural gas)
CT-STL-01	CT-STL-01A	X	Plantwide forced draft cooling towers
CT-STL-01	CT-STL-01B	X	Plantwide spray ponds
CU-STL-01	CU-STL-01A	X	Plantwide composite emissions
CU-STL-01	MS-029A-04	X	Fiber placement machine for composites
FA-005-01	FA-005-01	X	Fly ash collection system
HT-245-01	OV-245-04	X	Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-05	X	Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-06	X	Endothermic gas generator
MP-STL-01	MP-STL-01	X	Plantwide maintenance painting
MS-111-02	MS-111-02	X	Scrubbers (3) to control lab equipment
NONE	MT-245-02	X	Tank containing concentrated cutting fluid
NONE	MT-245-03	X	Cutting fluid mix tank
PT-027-04	IT-027-04A	X	Immersion tank 4 in the aluminum line
PT-027-11	IT-024-18A	X	Immersion tank 18 in the aluminum line
PT-051-01	IT-051-03A	X	Immersion tank 3 in the aluminum line
PT-101-04	IT-101-01P	X	Immersion tank (1) in the passivate line

PT-101-04	IT-101-02P	X	Immersion tank (2) in the passivate line
PT-101-04	IT-101-04P	X	Immersion tank (4) in the passivate line
PT-101-04	IT-101-07P	X	Immersion tank (7) in the passivate line
PT-101-03	IT-101-HA	X	Immersion tank H in the aluminum line
RF-STL-01	RF-STL-01	X	Plantwide gasoline refueling
RF-STL-02	RF-STL-02	X	Plantwide aircraft refueling
NONE	VR-STL-01	X	Plantwide diesel refueling
WE-STL-01	WE-STL-01	X	Plantwide welding
NONE	IT-027-01A	X	Immersion tank 1 in the aluminum line
NONE	IT-027-14P	X	Immersion tank 14 in the plating line
NONE	IT-027-15P	X	Immersion tank 15 in the plating line
NONE	IT-027-20A	X	Immersion tank 20 in the aluminum line
NONE	IT-027-40P	X	Immersion tank 40 in the plating line
NONE	IT-027-51P	X	Immersion tank 51 in the plating line
NONE	IT-101-01A	X	Immersion tank 1 in the aluminum line
NONE	IT-101-A1A	X	Immersion tank A1 in the aluminum line
NONE	IT-101-A2A	X	Immersion tank A2 in the aluminum line
NONE	IT-101-AA	X	Immersion tank A in the aluminum line
NONE	PT-STL-01	X	Plantwide particulate emitting sources not specifically listed
NONE	PT-101-06	X	Process tank line (small line)
NONE	PT-101D-05	X	Process tank line (R&D)
NONE	PT-102-01	X	Process tank line (small line)
NONE	PT-102-02	X	Process tank line (R&D/QA/QC)
NONE	PT-248-01	X	Process tank lines (R&D)
NONE	LH-STL-01	X	Plantwide lab hoods
NONE	LS-102-01	X	HF/DF laser used for testing
NONE	MS-STL-01	X	Plantwide hand held equipment (such as sanders, drills, riveters,.....)
NONE	SB-002-02	X	Booth for fan maintenance (cleaning not painting)
MP-STL-01	SB-002-05	X	Spray booth (maintenance) (aerosol cans)
NONE	SB-042-02	X	Vented hood (Laminar Bench) (soldering)
NONE	SB-042-03	X	Vented hood (soldering)

NONE	SB-107-01	X	Hood used for hydraulic testing
NONE	SC-STL-01	X	Plantwide salt corrosion chambers
NONE	ST-STL-D	X	Plantwide diesel/fuel oil/jet fuel storage tanks ($\leq 10,000$ gallons)
VARIOUS	OV-STL-01	X	Plantwide electric curing ovens
VARIOUS	OV-STL-02	X	Plantwide electric burn-off ovens

IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

1) **10 CSR 10-6.050; Start-Up, Shutdown and Malfunction Conditions**

a) Emission Limitations:

(1) None

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) At the time of each occurrence

(a) The permittee shall submit the following information to the director not later than 15 days after receipt of the notice of excess emissions from the agency.

1. Name and location of installation.
2. Name and telephone number of person responsible for the installation.
3. The identity of the equipment causing the excess emissions.
4. The time and duration of the period of excess emissions.
5. The cause of the excess emissions.
6. The type of air contaminant involved.
7. A best estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude.
8. The measures taken to mitigate the extent and duration of the excess emissions.
9. The measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) **10 CSR 10-6.060: Construction Permits Required**

a) Emission Limitations:

(1) The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five (5) years without first obtaining a permit from the permitting authority under this rule, unless a waiver is first obtained from the permitting authority.

(2) Construction that meets one of the requirements below are exempt from permitting.

(a) Criteria Pollutants

1. For construction or modification of units that will cause emissions from a location less than 500 feet from the property boundary, emissions of each criteria pollutant are less than 0.5 pounds per hour at maximum design rate.
2. For construction or modification of units that will cause emissions from a location more than 500 feet from the property boundary, emissions of each criteria pollutant are less than 0.91 pounds per hour at maximum design rate.
3. Actual emissions of each criteria pollutant will be no more than 876 pounds per year.

(b) Hazardous Air Pollutants

1. At maximum design capacity the construction or modification will result in emissions of a hazardous air pollutant at a rate of no more than 0.5 pounds per hour, or the hazardous air pollutant emission threshold as established in subsection (12)(J) of this rule.

(c) Other exemptions may also apply.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

INSSP/TV approved

3) 40 CFR Part 70 and 10 CSR 10-6.065: Operating Permits Required

a) Emission Limitations:

- (1) The permittee shall obtain an operating permit for the facility, so long as it has a potential to emit greater than the de minimis levels. The term of the operating permit is five years. It shall file for renewal of this operating permit no sooner than 18 months, nor later than six months, prior to the expiration date of this operating permit.

b) Record Keeping Requirements:

(1) Every 5 years

- (a) The permittee shall retain the most current operating permit issued to this facility on-site and shall immediately make such permit available to any agency personnel upon request.

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

- (1) Semi-Annual Monitoring Report.
- (2) Annual Compliance Certification.

4) 10 CSR 10-6.110: Submission of Emission Data, Emission Fees and Process Information

a) Emission Limitations:

(1) Annually

- (a) The permittee shall pay \$25.70 per ton of pollutant for certain pollutants or the amount established by the Missouri Air Conservation Commission under Missouri Air Law 643.079(1) if changed.

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b) Record Keeping Requirements:

(1) Annual

(a) The permittee shall complete and submit an EIQ in accordance with the requirements outlined in this rule.

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) Annual

(a) Submit EIQ by April 1 for the previous year.

5) 10 CSR 10-6.130: Controlling Emissions During Episodes of High Air Pollution Potential *in SIP*

a) Emission Limitations:

(1) As required

(a) This rule specifies the conditions that establish an air pollution alert (yellow/red), watch or emergency and the associated procedures and emissions reduction objectives for dealing with each.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) As required

(a) The permittee shall submit an appropriate emergency plan as required by the director.

6) 10 CSR 10-6.150: Circumvention *in SIP*

a) Emission Limitations:

(1) The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceal or dilute an emission of air contaminant which violates a rule of the Missouri Air Conservation Commission.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(a) None

d) Reporting Requirements:

(a) None

7) 10 CSR 10-6.180: Measurement of Emissions of Air Contaminants *in SIP*

a) Emission Limitations:

(1) None

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) As required

- (a) The director may require any person responsible for the source of emission of air contaminants to make or have made test to determine the quantity or nature, or both, of emission of air contaminants from the source.
 - 1. The director may specify testing methods to be used in accordance with good professional practice.
 - 2. The director may observe the testing.
 - 3. All tests shall be conducted by reputable qualified personnel.
- (b) The director may conduct tests of emissions of air contaminants from any source.
 - 1. Upon request from the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- d) Reporting Requirements:
 - (1) As required
 - (a) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

8) 10 CSR 10-5.070: Open Burning Restrictions *En 58p*

- a) Emission Limitations:
 - (1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning. Exception - Open burning of vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning. Open burning of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year.
- b) Record Keeping Requirements:
 - (1) Maintain files with letters from the director approving the open burning operation.
- c) Monitoring Requirements:
 - (1) None
- d) Reporting Requirements:
 - (1) At the time of each occurrence
 - (a) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - 1. The name, address and telephone number of the person submitting the application;
 - 2. The type of business or activity involved;
 - 3. A description of the proposed equipment and operating practices, including the type, quantity and composition of vegetation to be burned;
 - 4. The schedule of burning operations;
 - 5. The exact location where open burning will be used to dispose of the vegetation;
 - 6. Reasons why no method other than open burning is feasible; and
 - 7. Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

- (b) Upon approval of the application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt the permittee from the provisions of any other law, ordinance, or regulation.

II) **State/Local Only Enforceable Requirements**

1) **10 CSR 10-6.100: Alternate Emission Limits** *not in SIP*

a) Emission Limitations:

- (1) Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

2) **10 CSR 10-5.160: Control of Odors in the Ambient Air** *not in SIP*

a) Emission Limitations:

- (1) No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

(a) Residential, recreational, institutional, retail sales, hotel or educational premises.

(b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or

(c) Premises other than those above when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

- (2) The previously mentioned requirement shall apply only to objectionable odors.

(a) An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those if fewer than 20 people are exposed.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

III) **ST. LOUIS COUNTY APPLICABLE REQUIREMENTS**

The following rules are locally enforceable only:

1) The St. Louis County Air Pollution Control Code, Section 612.040, Air Quality Standards and Air Pollution Control Regulations

a) Emission Standards:

(1) Saint Louis County Air Pollution Control may enforce Missouri Code of State Regulations as adopted and promulgate by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

2) The St. Louis County Air Pollution Control Code, Section 612.100, Emergency Abatement of Violation

a) Emission Standards:

(1) By written approval of the County Executive, any facility indirectly or directly discharge any air contaminant in violation of The St. Louis County Air Pollution Control Code where it is the opinion of the Director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

3) The St. Louis County Air Pollution Control Code, Section 612.110, Permits Required

a) Emission Standards:

(1) The Permittee shall obtain St. Louis County Department of Health (DOH) operating permits for its installation. The Permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from St. Louis County DOH.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

4) The St. Louis County Air Pollution Control Code, Section 612.120, Permits to be Visibly Affixed or Placed

a) Emission Standards:

(1) The Permittee shall Visibly affix St. Louis County DOH Permit on or near permitted equipment.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) Visual inspection performed during periodic St. Louis County inspections.

d) Reporting Requirements:

(1) None

5) The St. Louis County Air Pollution Control Code, Section 612.200, Testing Prior to Granting of Operating Permit

a) Emission Standards:

(1) Before an authority to construct or permit to operate is granted, the Director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer. The permittee shall notify the County of the time and place of testing for the purpose of witnessing the test.

b) Record Keeping Requirements:

(1) Records shall be kept during testing as approved in a test protocol submitted to the County prior to testing.

c) Monitoring Requirements:

(1) Monitoring during testing shall be as approved in a test protocol submitted to the County prior to testing.

d) Reporting Requirements:

(1) Submittal of test results as reviewed and certified by a licensed engineer.

6) The St. Louis County Air Pollution Control Code, Section 612.220, Suspension or Revocation of Permits

a) Emission Standards:

(1) The Director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of The St. Louis County Air Pollution Control Code

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

7) The St. Louis County Air Pollution Control Code, Section 612.260, Schedules

a) Emission Standards:

(1) The Permittee shall pay St. Louis County DOH Construction Permit fees when applicable and annual Operating Permit fees in accordance with the rule.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

8) The St. Louis County Air Pollution Control Code, Section 612.280, Testing by Order of the Board

a) Emission Standards:

(1) If any article, machine, equipment or other contrivance is in violation of The St. Louis County Air Pollution Control Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the Director and approved by the Board to determine whether the equipment is in violation of this Code.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, R.S.Mo 1959. The engineer shall be selected by the permittee and approved by the Board.

d) Reporting Requirements:

The permittee shall give at least seven (7) days notice prior to the commencement of the test. The permittee shall report to the Air Pollution Control Section of the SLCDOH, 111 South Meramec, Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102.

9) The St. Louis County Air Pollution Control Code, Section 612.290, Right of Entry; Inspections; Samples

a) Emission Standards:

(1) The Permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

- d) Reporting Requirements:
 - (1) None

10) The St. Louis County Air Pollution Control Code, Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

- a) Emission Standards:
 - (1) None
- b) Record Keeping Requirements:
 - (1) None
- c) Monitoring Requirements:
 - (1) None
- d) Reporting Requirements:
 - (1) The permittee shall report to the Air Pollution Control Section of the SLCDOH, 111 South Meramec, Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102 within 24 hours of occurrence of any unavoidable upset in or breakdown of equipment that results in violation of St. Louis County Air Pollution Control requirements and in case of shutdown for necessary scheduled maintenance that may result in violation of St. Louis County Air Pollution Control requirements, the intent to be shutdown shall be reported to Air Pollution Control Section 24 hours prior to shutdown.

11) The St. Louis County Air Pollution Control Code, Section 612.340, Air Pollution Nuisances Prohibited

- a) Emission Standards:
 - (1) It is unlawful for the Permittee to cause of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.
- b) Record Keeping Requirements:
 - (1) None
- c) Monitoring Requirements:
 - (1) None
- d) Reporting Requirements:
 - (1) None

12) The St. Louis County Air Pollution Control Code, Section 612.380, Interfering with or Obstructing Division Personnel

- a) Emission Standards:
 - (1) No Person shall hinder, resist, interfere with or obstruct the Director or any Division employee in carrying out any duty for the Director or the Board.
- b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

V. General Permit Requirements

I. General Monitoring, Record keeping, and Reporting Requirements -- 10 CSR 10-6.065(6)(C)1.C

A. General Monitoring Requirements

- 1) None

B. General Record Keeping Requirements

- 1) All required monitoring data and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application.
- 2) Copies of all current operating ^{and} construction permits issued to this facility shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any St. Louis County Department of Health and Missouri Department of Natural Resources' (DNR) personnel upon request.

C. General Reporting Requirements

1) Semiannual Monitoring Reports

- a) The permittee shall submit a semiannual report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
- b) Each semiannual monitoring report must identify any deviations from permit requirements since the previous report, that have been monitored by the monitoring systems required under the permit, and any deviations from the monitoring, record keeping and reporting requirements of the permit.
- c) These reports shall be submitted to St. Louis County Department, Air Pollution Control, 111 S. Meramec Ave., Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102.

2) Annual Compliance Certification

- a) The annual compliance certification shall be submitted to St. Louis County, department of Health, Air Pollution Control and to the Administrator, EPA Region 7 Missouri Air Compliance Coordinator.

3) Supplemental reports.

- a) In addition to semiannual monitoring reports, the permittee is required to submit supplemental reports as specified below. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted either verbally or in writing within two (2) working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted facility must show that it was operated properly at the time and that during the period of the emergency the

- permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit based on its operating and maintenance plan. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable or on the schedule specified in this permit.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
- b) These supplemental reports shall be submitted to St. Louis County, Department of Health, Air Pollution Control, 111 S. Meramec Ave., Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102
- 4) Every report submitted shall be certified by a responsible official, except that, if a report of a deviation must be submitted within thirty (30) days or next working day after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten (10) days after that, together with any corrected or supplemental information required concerning the deviation.
- 5) The permittee may request confidential treatment of information submitted in any report in accordance with 10 CSR 10-6.210.

II. Standard Terms And Conditions

A D. General Requirements -- 10 CSR 10-6.065(6)(C)1.G.

- 1) Duty to comply – 10-6.065(6)(C)1.G.(I) McDonnell Douglas Corporation (the permittee) must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, for permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) Prohibited Defenses The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) Permit Actions The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition
- 4) Property Rights This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) Duty to provide information The permittee shall furnish to the director, upon receipt of a written request and within a reasonable time, any information that the director reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of

records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this requirement.

E. Permit Duration - 10 CSR 10-6.065(6)(C)1.B, 10-6.065(6)(E)3.

This permit is issued for a term of five (5) years. The permit term shall commence on the date of issuance of this permit. This permit shall expire at the end of this five (5) year time period, unless renewed or unless a complete permit renewal application is submitted at least six (6) months before the date of expiration. If a timely and complete application for a permit renewal is submitted, but the permitting authority fails to take final action to issue or deny the renewal permit before the expiration date of this permit, this permit shall not expire until the renewal permit is issued or denied. Any permit shield granted under this permit shall continue in effect during this period of time.

F. Severability Clause - 10 CSR 10-6.065(6)(C)1.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force.

G. Incentive Programs Not Requiring Permit Revisions - 10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

H. Certification Requirements--10 CSR 10-6.065(6)(C)3.A.

Unless otherwise specified in this permit, or by approval of the Director, any document (including reports) required to be submitted under this permit shall contain a certification signed by a responsible official that to the best of his/her knowledge the results of the required monitoring are true and accurate.

I. Inspection and Entry - 10 CSR 10-6.6065(6)(c)3.B.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the St. Louis County, Department of Health, Air Pollution Control, or their authorized agents, to perform the following (subject to your right to seek confidential treatment of information submitted to, or obtained by, the APCP).

- a) Enter upon your premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit,
- c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit, and
- d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

J. Progress Reports -- 10 CSR 10-6.6065(6)(c)3.D.

All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:

- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
- b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

K. Compliance Certification -- 10 CSR 10-6.6065(6)(c)3.E.

- a) The permittee shall submit a certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices.
- b) These certifications shall be submitted annually (unless the applicable requirement specifies submission more frequently),
- c) The compliance certification shall include the following:
 - i) The identification of each term or condition of the permit that is the basis of the certification,
 - ii) Your current compliance status, as shown by monitoring data and other information reasonably available to you,
 - iii) Whether compliance was continuous or intermittent,
 - iv) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
 - v) Such other facts as the APCP will require in order to determine the compliance status of this facility.

L. Risk Management Plans Under Section 112(r) 10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- a) June 21, 1999
- b) Three (3) years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- c) The date on which a regulated substance is first present above a threshold quantity in a process.

M. Federal Enforceability - 10 CSR 10-6.065(6)(C)2.

All terms and conditions of this permit are federally enforceable, except for those terms and conditions designated in the permit as not federally enforceable (State/Local).

N. Responsible Official - 10 CSR-6.020(2)(r)12.

The application utilized in the preparation of this was signed by John J. Van Gels, Vice President General Manager Production Operation and General Services. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within thirty days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in

the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants. Gerard J. Olsen Director of General Services and Michael J. Dwyer Director of Safety, Health and Environmental Affairs may serve as alternate Responsible Officials should Mr. Van Gels be unavailable.

Ø. Statement Of Basis - 10 CSR 0-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

III. PERMIT SHIELD-10 CSR 10-6.065(6)(C)6 (FEDERALLY AND STATE ENFORCEABLE).

A. Compliance with the terms and conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

- 1) The applicable requirements are included and specifically identified in this permit; or
- 2) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit or Statement of Basis, are not applicable to the installation, and this permit or the Statement of Basis expressly includes that determination or a concise summary of it.

B. The permit shield does not affect the following:

- 1) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
- 2) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
- 3) The applicable requirements of the acid rain program,
- 4) The administrator's authority to obtain information,
- 5) The provisions of 40 CFR Part 82, or
- 6) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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III. Emergency Provisions - 10 CSR 10-6.065(6)(C)7.

A. An emergency or upset shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, you must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- 1) That an emergency or upset occurred and that you can identify the source of the emergency or upset,
- 2) That the installation was being operated properly,
- 3) That you took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit.
- 4) That you submitted notice of the emergency to the APCP within two (2) working days of the time when emission limitations were exceeded due to the emergency.

This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

- B.** An emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

IV. Definitions

- A.** Chemical Milling Maskant: a coating that is applied directly to aluminum components to protect surface areas when chemical milling the component with a Type I or Type II etchant. Type I chemical milling maskants are used with a Type I etchant and Type II chemical milling maskants are used with a Type II etchant. This definition does not include bonding maskants, critical use and line sealer maskants, and seal coat maskants. Additionally, maskants that must be used with a combination of Type I or II etchants and any of the above types of maskants (i.e., bonding, critical use and line sealer, and seal coat) are also exempt from this subpart. (Words in this definition have the same meaning as in the Aerospace NESHAP 40 CFR Part 63, Subpart GG.)
- B.** Day: A 24 hour period, midnight to midnight, not including weekends or official facility holidays.
- C.** Director: the Director of the Department of Natural Resources Air Program or his designee.
- D.** St. Louis County Air Pollution Control Program Manager: Air Pollution Control Program Manager or his designee.

V. Permit Actions

- A.** Operational Flexibility - 10 CSR 10-6.065(6)(C)8 (Federally and State enforceable).
The permitted installation is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify this agency and the administrator at least seven (7) days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally-enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.
 - 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, the permittee shall provide advance written notice to this agency and to the administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be

provided to the administrator and this agency at least seven (7) days before the change is to be made. If less than seven (7) days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.

- b) The permit shield shall not apply to these changes.
- 2) SIP-based emissions trading changes. Does not apply.
- 3) Emissions cap-based changes. Does not apply.
- 4) Off-Permit Changes - 10 CSR 10-6.065(6)(C)9 (Federally and State enforceable).
 - a) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision.
 - b) Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section.
 - c) Off-permit changes shall be subject to the following requirements and restrictions:
 - i) Compliance with applicable requirements. The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision, even if the change is not addressed in or constrained by the permit, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - ii) Contemporaneous notice, except insignificant activities. The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - iii) Record of changes. The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

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APPENDIX 1

Table I: Specialty Coating VOC Limitations.

	Pounds per Gallon	Grams per Liter
Ablative Coating	5.0	600
Adhesion Promoter	7.4	890
Adhesive Bonding Primers:		
Cured at 250°F or below	7.1	850
Cured above 250°F	8.6	1030
Adhesives:		
Commercial Interior Adhesive	6.3	760
Cyanoacrylate Adhesive	8.5	1020
Fuel Tank Adhesive	5.2	620
Nonstructural Adhesive	3.0	360
Rocket Motor Bonding Adhesive	7.4	890
Rubber-Based Adhesive	7.1	850
Structural Autoclavable Adhesive	0.5	60
Structural Nonautoclaveable Adhesive	7.1	850
Antichafe Coating	5.5	660
Bearing Coating	5.2	620
Caulking and Smoothing Compounds	7.1	850
Chemical Agent-Resistant Coating	4.6	550
Clear Coating	6.0	720
Commercial Exterior Aerodynamic Structure Primer	5.4	650
Compatible Substrate Primer	6.5	780
Corrosion Prevention Compound	5.9	710
Cryogenic Flexible Primer	5.4	645
Cryoprotective Coating	5.0	600
Dry Lubricative Material	7.3	880
Electric or Radiation-Effect Coating	6.7	800
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	6.7	800
Elevated Temperature Skydrol Resistant Commercial Primer	6.2	740
Epoxy Polyamide Topcoat	5.5	660
Fire-Resistant (interior) Coating	6.7	800
Flexible Primer	5.3	640
Flight Test Coatings:		
Missile or Single Use Aircraft	3.5	420
All Others	7.0	840
Fuel-Tank Coating	6.0	720
High-Temperature Coating	7.1	850
Insulation Covering	6.2	740
Intermediate Release Coating	6.3	750
Lacquer	6.9	830
Maskant:		
Bonding Maskant	10.3	1230
Critical Use and Line Sealer Maskant	8.5	1020
Seal Coat Maskant	10.3	1230

	Pounds per Gallon	Grams per Liter
Metallized Epoxy Coating	6.2	740
Mold Release	6.5	780
Optical Anti-Reflective Coating	6.3	750
Part Marking Coating	7.1	850
Pretreatment Coating	6.5	780
Rain Erosion-Resistant Coating	7.1	850
Rocket Motor Nozzle Coating	5.5	660
Scale Inhibitor	7.3	880
Screen Print Ink	7.0	840
Sealants:		
Extrudable/Rollable/Brushable Sealant	2.3	280
Sprayable Sealant	5.0	600
Silicone Insulation Material	7.1	850
Solid Film Lubricant	7.3	880
Specialized Function Coating	7.4	890
Temporary Protective Coating	2.7	320
Thermal Control Coating	6.7	800
Wet Fastener Installation Coating	5.6	675
Wing Coating	7.1	850

STATEMENT OF BASIS

What is source major for?

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 5, 1997;
- 2) 1998 Emissions Inventory Questionnaire;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-5.040, "Use of Fuel in Hand-Fired Equipment Prohibited", all facilities in the non-attainment area are subject to this rule.

10 CSR 10-5.295, "Control of Emissions From Aerospace Manufacture and Rework Facilities", the rule went into effect Feb. 29, 2000.

10 CSR 10-5.510, "Control of Emissions of Nitrogen Oxides" the rule went into effect Feb. 29, 2000 and the actual compliance date is May 1, 2002.

10 CSR 10-6.220, "Restriction of Emission of Visible Air Contaminants" the rule went into effect November 30, 1999.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.110, "Restrictions of Emissions of Sulfur Dioxide for Use of Fuel", the rule was rescinded July 30, 1997.

10 CSR 10-5.150, "Emission of Certain Sulfur Compounds Restricted", the rule was rescinded July 30, 1997.

10 CSR 10-5.060, "Refuse Note to be Burned in Fuel Burning Installations" has been rescinded by the State.

10 CSR 10-5.090, "Restriction of Emission of Visible Air Contaminants" has been rescinded by the State.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

- 1) Construction Permit No. 01780 (St. Louis County Air Pollution Control Operating Permit 5771) language was changed to coincide with the language in the rules. The limitations were not changed.
- 2) Construction Permit No. 6280 (St. Louis County Air Pollution Control Operating Permit 6208) language was changed to coincide with the language in the rules. The limitations were not changed.

NSPS Applicability *60*

60 Subpart Dc "Small Industrial - Commercial - Institutional Steam Generating Units" the facility's boilers (10 - 100 MMBTU/hr) have not been modified, constructed or reconstructed after 06/09/89.

60 Subpart Ea "Municipal Waste Combustors" the two (2) refuse-fired boilers have been removed.

60 Subpart K and Ka "Storage Vessels for Petroleum Liquids after June 11, 1973" and "Storage Vessels for Petroleum Liquids" there are no "petroleum liquid" storage tanks with the capacity greater than 40,000 gallons (Fuel oils nos. 2 through 6 and diesel fuel nos. 2-D and 4-D are exempt from the definition of "Petroleum Liquids"). *what about Kb?*

MACT Applicability *GG, T, I*

~~None~~

NESHAP Applicability *63?*

Subpart I was rescinded by the US EPA.

Other Regulatory Determinations

10 CSR 10-5.130, "Certain Coals To Be Washed", the facility does not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption coal.

10 CSR 10-5.240, "Additional Air Quality Control Measures May be Required When Sources are Clustered in a Small Land Area" facility is not located in a small land area as defined by the rule.

10 CSR 10-5.370, "Control of Emissions from the Application of Deadeners and Adhesives", the facility is not an automotive manufacturer as required to be subject to the rule.

10 CSR 10-5.430, "Control of Emissions From the Surface Coating of Chrome-Plated and Resist Plastic Parts", this rule only applies to the Seigel-Robert Plating Company located in South St. Louis.

10 CSR 10-5.455, "Control of Emission from Solvent Cleanup Operation", the facility emits less than 500 lbs. per day of VOCs from any non-exempt solvent cleanup operations.

10 CSR 10-5.500, "Control of Emissions from Volatile Organic Liquid Storage", all storage vessels that meet the requirements of this rule are either subject to or exempt from the requirements of 40 CFR parts 60, 61, or 63 and are exempt from this rule.

10 CSR 10-5.520, "Control of Volatile Organic Compound Emissions From Existing Major Sources", does not apply to this facility because the facility is subject to one or more rules under Title 10, Chapter 5 or the *Code of State Regulations* (CSR) applies to volatile organic compound (VOC) emissions from a product process, or a raw material, intermediate or product tank.

10 CSR 10-5.540, "Control of Emissions From Batch Process Operations", the facility does not operate any batch operations which meets the requirement of a potential to emit a 100 tons/year of Volatile Organic Compounds nor do they have any operations within the SIC codes listed in the rule.

10 CSR 10-6.100, "Alternate Emission Limits", the facility has not proposed any alternate ways of meeting VOC emission limits required in 10 CSR 10-5.

10 CSR 10-6.270, "Acid Rain Source Permits Required" facility coal fired power plant is not a producer of electricity and thus, is not in a source category requiring an acid rain permit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one (1) or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one (1) or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Changes Made Based on Public Comment

One comment letter was received on December 22, 2000. The letter was submitted by Bret Spoerle, Environmental Engineer, McDonnell Douglas Corporation, a wholly-owned subsidiary of the Boeing Company. The following are the changes made to the draft permit on December 27, 2000 based on Mr. Spoerle's comments:

1. Please remove Permit Condition EU0130-001 (Off-site Waste NESHAP) and change the X in the under EU0130 to NA. The shelter (MS-027-04) no longer accepts waste from off-site. This rule therefore, is no longer applicable to the shelter and should be removed from the permit. Agreed - Permit was modified.
2. In meetings between the agencies and the company and earlier drafts of the permit, specific opacity provisions had been discussed and agreed to for 10 CSR 10-5.090 "Restriction of Emissions of Visible Contaminants." While this rule has been rescinded and consolidated into 10 CSR 10-6.220, this action has not changed the St. Louis area opacity requirements. Please replace the wording currently in the draft permit under PW003 with the previously agreed to wording as listed below.

e) Emission Limitations:

- (1) The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of an opacity greater than 20%, unless it is an existing source (existing prior to March 24, 1967), which emits less than 25 lbs/hr PM.
- (2) If it is an existing source, which emits less than 25 lbs/hr PM, then the permittee shall not discharge into the ambient air any air contaminant of an opacity greater than 40%.
- (3) A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
- (4) Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

f) Record Keeping Requirements:

- (1) Monthly
 - (a) The permittee shall maintain records of the visual inspections plus records of official Method 9 opacity tests, if required.

g) Monitoring Requirements:

- (1) Monthly
 - (a) The permittee shall conduct visual observations.
 - (b) Absence of visible emissions will demonstrate compliance.
- (2) At the time of each occurrence
 - (a) If visible emissions are documented in one of the monthly observations, a certified opacity reader will perform a visible emissions determination using EPA Reference Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources* to determine whether emissions exceed the opacity limits set forth above.

h) Reporting Requirements:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of an exceedance of the opacity limit established under i) Emission Limitations.

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Permit was modified to reflect the above wording.

Prepared by:

Liz Hines for Kathrina Donegan

Kathrina Donegan
Environmental Engineer